

From: [Bradley, Keith](#)
To: [Brown, Laura J.S. \(ENRD\)](#); [Luna, Mario \(ENRD\)](#)
Cc: [Walker, Jeffrey](#)
Subject: [EXTERNAL] Re: Pebble, D. Alaska No. 24-59, page expansion
Date: Tuesday, September 30, 2025 4:42:08 PM

Apologies for the delay! We have an answer from the state, obviously! The NVCs told me they won't be needing extra pages.

Meanwhile, I don't have authorization to agree to additional days on your deadline, sadly. So I will plan to report that DOJ opposes our request for a 2X brief.

From: Brown, Laura J.S. (ENRD) <Laura.J.S.Brown@usdoj.gov>
Sent: Wednesday, September 10, 2025 7:47 AM
To: Bradley, Keith; Luna, Mario (ENRD)
Cc: Walker, Jeffrey
Subject: [EXT] RE: Pebble, D. Alaska No. 24-59, page expansion

Hi Keith,

I wanted to follow up on our call a couple weeks ago. Were you able to confer with the remaining defendants regarding the page length of their briefs?

Thanks,
Laura

From: Brown, Laura J.S. (ENRD)
Sent: Friday, August 29, 2025 9:57 AM
To: Bradley, Keith <keith.bradley@squirepb.com>; Luna, Mario (ENRD) <Mario.Luna@usdoj.gov>
Cc: Walker, Jeffrey <jeffrey.walker@squirepb.com>
Subject: RE: Pebble, D. Alaska No. 24-59, page expansion

Works for me, thanks.

From: Bradley, Keith <keith.bradley@squirepb.com>
Sent: Friday, August 29, 2025 9:55 AM
To: Brown, Laura J.S. (ENRD) <Laura.J.S.Brown@usdoj.gov>; Luna, Mario (ENRD) <Mario.Luna@usdoj.gov>
Cc: Walker, Jeffrey <jeffrey.walker@squirepb.com>
Subject: [EXTERNAL] Re: Pebble, D. Alaska No. 24-59, page expansion

Sure! Today, any time noon eastern to 3 eastern - shall we say 2pm just to pick a time?

From: Brown, Laura J.S. (ENRD) <Laura.J.S.Brown@usdoj.gov>

Sent: Friday, August 29, 2025 7:35 AM

To: Bradley, Keith; Luna, Mario (ENRD)

Cc: Walker, Jeffrey

Subject: [EXT] RE: Pebble, D. Alaska No. 24-59, page expansion

Hi Keith, do you have time to touch base today (before 3) or alternatively on Tuesday (anytime after 1)?

From: Bradley, Keith <keith.bradley@squirepb.com>

Sent: Wednesday, August 27, 2025 12:29 PM

To: Brown, Laura J.S. (ENRD) <Laura.J.S.Brown@usdoj.gov>; Luna, Mario (ENRD) <Mario.Luna@usdoj.gov>

Cc: Walker, Jeffrey <jeffrey.walker@squirepb.com>

Subject: [EXTERNAL] Re: Pebble, D. Alaska No. 24-59, page expansion

We hadn't actually decided on that.

a. I figure you will also want additional pages for your response brief, given you have three opening briefs to cover plus (hopefully) ours being 70 pages. But Mark didn't have any views on how long the DOJ brief would be.

b. In our reply, we'll be facing your longer brief plus three intervenor briefs. I don't know what those will be like, and Trout Unlimited has already told us they want to file a longer brief than what the court originally contemplated.

Would it be worth getting on the phone to talk about the details and work something out? I know we need the 70 pages, and beyond that we'd just like to do something sensible.

From: Brown, Laura J.S. (ENRD) <Laura.J.S.Brown@usdoj.gov>

Sent: Wednesday, August 27, 2025 9:46 AM

To: Bradley, Keith; Luna, Mario (ENRD)

Cc: Walker, Jeffrey

Subject: [EXT] RE: Pebble, D. Alaska No. 24-59, page expansion

One follow up, how many pages are you seeking on reply?

From: Brown, Laura J.S. (ENRD)

Sent: Wednesday, August 27, 2025 11:43 AM

To: 'Bradley, Keith' <keith.bradley@squirepb.com>; Luna, Mario (ENRD) <Mario.Luna@usdoj.gov>

Cc: Walker, Jeffrey <jeffrey.walker@squirepb.com>

Subject: RE: Pebble, D. Alaska No. 24-59, page expansion

Hi Keith – sorry for the delayed response, I was out of the country but will be discussing this with my client today.

From: Bradley, Keith <keith.bradley@squirepb.com>

Sent: Thursday, August 14, 2025 6:28 AM

To: Luna, Mario (ENRD) <Mario.Luna@usdoj.gov>; Brown, Laura J.S. (ENRD) <Laura.J.S.Brown@usdoj.gov>

Cc: Walker, Jeffrey <jeffrey.walker@squirepb.com>

Subject: [EXTERNAL] Pebble, D. Alaska No. 24-59, page expansion

Dear Laura and Mario,

We have a summary judgment brief due at the beginning of October. I mentioned to Mark in his last week that we will need additional pages beyond the normal length limit in the local rules. This is what we referring to in our reply on the SJ schedule where we said we had given DOJ a heads-up on that point.

What we would like to propose to the court is 70 pages, basically 2X the length from the local rules. As I said to Mark, we understand also that DOJ would then be responding to our extra-long brief, as well as the briefs from the two other plaintiff groups, so presumably DOJ would need more length as well (amount TBD after you assess). We will also need additional length on the reply, because we'll be responding to an extra-length DOJ brief plus the briefs of the three intervenor groups. I'm happy to discuss both of those, but in the near term we need to get our motion on file for the opening brief.

Could you let me know the government's position on a motion to have a 70-page Pebble opening brief? I'm available at your convenience to discuss, 303-261-5484.

Yours,
Keith

be responding t

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